

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: **COREY RENEE TATE** **CASE NO. 20-50491-KMS**
PAMELA CHERRYE TATE, Debtors **CHAPTER 13**

MOTION TO REOPEN BANKRUPTCY CASE

COME NOW, Debtors, by and through counsel, and move this Court to reopen their Chapter 13 bankruptcy case pursuant to Rule 4007(b), and in support thereof, would show the Court as follows:

I.

Debtors intend to bring file an adversary proceeding for turnover of property of the estate and violation of the discharge injunction.

II.

Debtors are requesting that the Chapter 13 bankruptcy be reopened.

WHEREFORE, Debtors pray that their Bankruptcy Case be reopened and for such additional or alternative relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)

Of Counsel:

Thomas C. Rollins, Jr.
Jennifer Ann Curry Calvillo
The Rollins Law Firm, PLLC
P.O Box 13767
Jackson, MS 39236
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Motion was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)

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4 **UNITED STATES BANKRUPTCY COURT**
5 **SOUTHERN DISTRICT OF MISSISSIPPI**

6 IN RE:
7 COREY RENEE TATE
8 PAMELA CHERRYE TATE

9
10 CASE NO: 20-50491
11 **DECLARATION OF MAILING**
12 **CERTIFICATE OF SERVICE**
13 Chapter: 13

14
15 On 6/10/2025, I did cause a copy of the following documents, described below,

16 Motion to Reopen Case

17
18 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
20 incorporated as if fully set forth herein.

21 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
22 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
23 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
24 fully set forth herein.

25 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
26 served electronically with the documents described herein per the ECF/PACER system.

27 DATED: 6/10/2025

28 /s/ Thomas C. Rollins, Jr.
29 Thomas C. Rollins, Jr. 103469

30 The Rollins Law Firm
31 PO Box 13767
32 Jackson, MS 39236
33 601 500 5533
34 jennifer@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

COREY RENEE TATE
PAMELA CHERRYE TATE

CASE NO: 20-50491

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 6/10/2025, a copy of the following documents, described below,

Motion to Reopen Case

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 6/10/2025



Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
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USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
 NCRS ADDRESS DOWNLOAD
 CASE 20-50491
 SOUTHERN DISTRICT OF MISSISSIPPI
 TUE JUN 10 9-2-39 PST 2025

EXCLUDE

US BANKRUPTCY COURT
DAN M RUSSELL JR US COURTHOUSE
2012 15TH STREET SUITE 244
GULFPORT MS 39501-2036

ADVANCE AMERICA
 4600 HARDY ST
 STE 6
 HATTIESBURG MS 39402-1349

CAPITAL ONE
 PO BOX 60599
 CITY OF INDUS CA 91716-0599

CASH COW
 919 OLD HWY 98 E
 COLUMBIA MS 39429

CASH COW E Z CASH
 CO LEGAL DEPT
 8601 DUNWOODY PLACE STE 406
 ATLANTA GA 30350-2550

CASHNETUSA
 175 W JACKSON BLVD
 SUITE 1000
 CHICAGO IL 60604-2863

CHECK INTO CASH
 21 GRAVOIS BLUFFS PLAZ
 FENTON MO 63026-4012

CHECK INTO CASH DBA CHECK INTO CASH OF
 MISSISSIPPI
 CHECK INTO CASH INC
 BANKRUPTCY DIVISION PO BOX 550
 CLEVELAND TN 37364-0550

CREDIT ONE BANK
 PO BOX 98873
 LAS VEGAS NV 89193-8873

DEPARTMENT OF THE TREASURY
 INTERNAL REVENUE SERVICE
 PO BOX 7346
 PHILADELPHIA PA 19101-7346

(P) FAMILY CHOICE FINANCIAL
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 PEARL MS 39208-3539

FIRST HERITAGE CREDIT OF MISSISSIPPI
 LLC
 DBA 1ST HERITAGE CREDIT
 1024 HWY 51 98 STE C
 MC COMB MS 39648

HYUNDAI CAPITAL AMERICA (HCA) DBA KIA
 MOTORS
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 RESURGENT CAPITAL
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 GREENVILLE SC 29603-0587

LVNV FUNDING LLC
 RESURGENT CAPITAL SERVICES
 PO BOX 10587
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USPS FIRST CLASS MAILING RECIPIENTS:

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WORLD FINANCE
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